

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ARA ARTUNI, ET AL.,

Defendants.

No. CR 2:25-00434-JLS

AMENDED PROTECTIVE ORDER REGARDING
DISCOVERY CONTAINING PERSONAL
IDENTIFYING INFORMATION, MEDICAL
INFORMATION, PRIVACY ACT
INFORMANT, COOPERATING WITNESS,
AND COOPERATING DEFENDANT
INFORMATION

The Court has read and considered the parties' Stipulation for a Protective Order Regarding Discovery Containing Personal Identifying Information ("PII"), Medical Information, Privacy Act Information ("PAI"), and Confidential Informant ("CI"), Cooperating Witness ("CW"), and Cooperating Defendant Information, filed by the government and defendant ARA ARTUNI, also known as ("aka") "Ara Harutyunyan," aka "Aro," aka "Araboyi," aka "Arabo," aka "Santos," ("defendant ARTUNI"), defendant ALEX AGOPIAN aka "Alik," ("defendant AGOPIAN"), defendant VAHAGN STEPANYAN, aka "Vee," aka "Vova Titov," aka "Juha Alver," aka "Vahan Stephanian," aka "Aso Balvanov," ("defendant STEPANYAN"), defendant ARVIN ALBERT KAZARYAN, aka

1 "Artur," aka "Art," ("defendant KAZARYAN"), defendant MANUK MANUKYAN
2 ("defendant MANUKYAN"), and defendant LEVON ARAKELYAN ("defendant
3 ARAKELYAN"), (collectively the "defendants"), in this matter on
4 August 6, 2025, which this Court incorporates by reference into this
5 order, and FOR GOOD CAUSE SHOWN the Court hereby FINDS AND ORDERS as
6 follows:

7 1. The government's discovery in this case relates to
8 defendants' alleged crimes, that is, violations of 18 U.S.C. §
9 1962(d): Racketeer Influenced and Corrupt Organizations Conspiracy;
10 18 U.S.C. §§ 1959(a)(3), (a)(5): Violent Crimes in Aid of
11 Racketeering Activity; 18 U.S.C. § 1349: Conspiracy to Commit Wire
12 Fraud and Bank Fraud; 18 U.S.C. § 371: Conspiracy to Commit Theft
13 from Interstate and Foreign Shipments; 18 U.S.C. § 922(g)(1): Felon
14 in Possession of Firearms and Ammunition; 18 U.S.C. § 922(o)(1):
15 Possession of Machineguns; 26 U.S.C. § 5861(d): Possession of
16 Unregistered Firearms; and 26 U.S.C. § 5861(i): Possession of
17 Firearms Not Identified by a Serial Number.

18 2. A protective order for the discovery is necessary so that
19 the government can produce to the defense materials regarding
20 confidential informants ("CI"), cooperating witnesses ("CW"), and/or
21 cooperating defendants who participated in the government's
22 investigation and who may testify at trial. Because these materials
23 could be used to identify the confidential informants, cooperating
24 witnesses, and/or cooperating defendants, the Court finds that the
25 unauthorized dissemination or distribution of the materials may (1)
26 compromise the ability of such person(s) to participate effectively
27 in the instant matter, (2) compromise the ability of such person(s)
28 to participate in future investigations in an undercover capacity,

1 and/or (3) expose him/her and/or his/her family to potential safety
2 risks.

3 3. A protective order for the discovery is also necessary so
4 that the government can produce to the defense materials containing
5 third parties' PII and medical information. The Court finds that
6 disclosure of this information without limitation risks the privacy
7 and security of the information's legitimate owners. The medical
8 information at issue may also be subject to various federal laws
9 protecting the privacy of medical records, including provisions of
10 the Privacy Act, 5 U.S.C. § 552a; provisions of 45 C.F.R.
11 §§ 164.102-164.534; and/or provisions of 42 U.S.C. § 1306. Because
12 the government has an ongoing obligation to protect third parties'
13 PII and medical information, the government cannot produce to any
14 defendant an unredacted set of discovery containing this information
15 without this Court entering the Protective Order. Moreover, PII and
16 medical information make up a significant part of the discovery in
17 this case and such information itself, in many instances, has
18 evidentiary value. If the government were to attempt to redact all
19 this information in strict compliance with Federal Rule of Criminal
20 Procedure 49.1, the Central District of California's Local Rules
21 regarding redaction, and the Privacy Policy of the United States
22 Judicial Conference, the defense would receive a set of discovery
23 that would be highly confusing and difficult to understand, and it
24 would be challenging for defense counsel to adequately evaluate the
25 case, provide advice to their respective defendant, or prepare for
26 trial.

27 4. An order is also necessary because the government intends
28 to produce to the defense materials that may contain information

1 within the scope of the Privacy Act, 5 U.S.C. § 552a ("Privacy Act
2 Information"). The Court finds that, to the extent that these
3 materials contain Privacy Act information, disclosure is authorized
4 pursuant to 5 U.S.C. § 552a(b)(11).

5 5. The purpose of this Protective Order is therefore to
6 (a) allow the government to comply with its discovery obligations
7 while protecting this sensitive information from unauthorized
8 dissemination, and (b) provide defense counsel with sufficient
9 information to adequately represent their respective defendant.

10 6. Accordingly, the discovery that the government will
11 provide to defense counsel in the above-captioned case will be
12 subject to this Protective Order, as follows:

13 a. "Victim Information" includes information relating to
14 any and all "means of identification" of a victim and his/her family
15 members under 18 U.S.C. § 1028(d)(7), and further includes, but is
16 not limited to, PII Materials, Privacy Act Information, Medical
17 Materials, and any and all identifying statements made by a victim
18 that were audio and/or video recorded, summarized in reports or
19 affidavits, and/or contained in transcripts of recordings that were
20 made in English or translated from any foreign language, including, but
21 not limited to, Spanish, Armenian, and/or Russian, to English.

22 b. "Witness Information" includes information relating
23 to any and all "means of identification" of a witness and his/her
24 family members under 18 U.S.C. § 1028(d)(7), and further includes, but
25 is not limited to, PII Materials, Privacy Act Information, Medical
26 Materials, and any and all identifying statements made by a witness
27 that were audio and/or video recorded, summarized in reports or
28 affidavits, and/or contained in transcripts of recordings that were

1 made in English or translated from any foreign language, including, but
2 not limited to, Spanish, Armenian, and/or Russian, to English.

3 c. "Cooperating Informant or Witness Information"
4 includes information relating to any and all "means of
5 identification" of a CI or CW and his/her family members under 18
6 U.S.C. § 1028(d)(7), and further includes, but is not limited to, PII
7 Materials, Privacy Act Information, Medical Materials, nicknames,
8 law enforcement identifiers (e.g., confidential human source names
9 and/or numbers), and any and all identifying statements made by a CI
10 or CW that were audio and/or video recorded, summarized in reports or
11 affidavits, and/or contained in transcripts of recordings that were
12 made in English or translated from any foreign language, including, but
13 not limited to, Spanish, Armenian, and/or Russian, to English.

14 d. "Cooperating Defendant Information" includes any and
15 all information relating to any "means of identification" of a
16 cooperating defendant and his/her family members under 18 U.S.C. §
17 1028(d)(7), and further includes, but is not limited to, PII
18 Materials, Privacy Act Information, Medical Materials, nicknames,
19 and/or law enforcement identifiers (e.g., confidential human source
20 names and/or numbers), and any and all identifying statements made by
21 a cooperating defendant that were audio and/or video recorded,
22 summarized in reports or affidavits, and/or contained in transcripts
23 of recordings that were made in English or translated from any foreign
24 language, including, but not limited to, Spanish, Armenian, and/or
25 Russian, to English.

26 e. "CI Materials" includes, but is not limited to, PII
27 Materials, Privacy Act Information, and Medical Materials.
28

1 f. "PII Materials" includes any and all information that
2 can be used to identify any person, including, but not limited to, a
3 name, address, date of birth, Social Security number, driver's
4 license number, telephone number, account number, email address, or
5 personal identification number.

6 g. "Medical Materials" includes any and all individually
7 identifiable health information that is connected to a patient's
8 name, address, or other identifying number, such as a Social
9 Security number or Medicare/Medi-Cal number.

10 h. "Attorney's Eyes Only ("AEO") Materials" includes
11 Victim Information, Witness Information, Cooperating Informant or
12 Witness Information, and Cooperating Defendant Information, in
13 addition to any and all information relating to a CI, CW, and/or
14 defendant's current and prior history of cooperation with law
15 enforcement, current and prior criminal history, statements, or any
16 other information that could be used to identify a CI, CW, and/or
17 cooperating defendant, including, but not limited to, a name,
18 nickname, image, address, date of birth, or unique personal
19 identification number, such as a Social Security number, law
20 enforcement number, driver's license number, account number, and/or
21 telephone number.

22 i. "Confidential Information" refers to any document or
23 information containing: CI Materials, Privacy Act Information, PII
24 Materials, and/or Medical Materials that the government produces to
25 the defense pursuant to this Protective Order and any copies
26 thereof.

27 j. "AEO Information" refers to any document or
28 information containing AEO Materials that the government produces to

1 the defense pursuant to this Protective Order and any copies
2 thereof.

3 k. For each individual defendant, "Defense Team"
4 includes (1) his counsel of record ("defense counsel"); (2) other
5 attorneys at defense counsel's law firm who may be consulted
6 regarding case strategy in this case; (3) defense investigators who
7 are assisting defense counsel with this case; (4) retained experts
8 or potential experts; and (5) paralegals, legal assistants, and
9 other support staff to defense counsel who are providing assistance
10 on this case (1) whom defense counsel has identified to the
11 government in writing and (2) who have (a) signed Exhibit A to the
12 underlying stipulation or a similar form attached thereto, (b)
13 provided the signed exhibit to the government, and (c) filed the
14 signed exhibit on the docket in this matter consistent with and with
15 reference to this stipulation. The Defense Team does not include
16 any defendant, any defendant's family members, any other associates
17 of a defendant, or anyone who has not is signatory to this
18 stipulation or any of its exhibits.

19 l. For each individual defendant, "AEO Defense Team"
20 includes defense counsel in addition to specific attorneys and/or
21 paralegals at defense counsel's law firm who are assisting defense
22 counsel with this case (1) whom defense counsel has identified to
23 the government in writing and (2) who have (a) signed Exhibit A to
24 the underlying stipulation or a similar form attached hereto, (b)
25 provided the signed exhibit to the government, and (c) filed the
26 signed exhibit on the docket in this matter consistent with and with
27 reference to this stipulation. The AEO Defense Team does not
28 include any defendant, any defendant's family members, any other

1 associates of a defendant, or anyone who has not is signatory to
2 this stipulation or any of its exhibits.

3 m. The government is authorized to provide defense
4 counsel with Confidential Information marked with the following
5 legend: "CONFIDENTIAL INFORMATION -- CONTENTS SUBJECT TO PROTECTIVE
6 ORDER." The government may put that legend on the digital medium
7 (such as DVD or hard drive) or simply label a digital folder on the
8 digital medium to cover the content of that digital folder. The
9 government may also redact any PII contained in the production of
10 Confidential Information.

11 n. The government is authorized to provide defense
12 counsel with AEO Information marked with the following legend or
13 something similar: "ATTORNEY'S EYES ONLY -- CONTENTS SUBJECT TO
14 PROTECTIVE ORDER." The government may put that legend on the
15 digital medium (such as DVD or hard drive) or simply label a digital
16 folder on the digital medium to cover the content of that digital
17 folder. The government may also redact any CI Materials, PII
18 Materials, Privacy Act Information, Medical Materials, or AEO
19 Materials contained in the production of AEO Information.

20 o. If any defendant objects to a designation that
21 material contains Confidential Information and/or AEO Information,
22 that defendant, by and through his attorney of record, shall meet
23 and confer with the government. If the parties cannot reach an
24 agreement regarding the defendant's objection, said defendant may
25 apply to the Court to have the designation removed.

26 p. Each defendant, his Defense Team, and his AEO Defense
27 Team shall use the Confidential Information and/or AEO Information
28 solely to prepare for any pretrial motions, plea negotiations,

1 trial, and sentencing hearing in this case, as well as any appellate
2 and post-conviction proceedings related to this case.

3 q. Each defendant's Defense Team shall not permit anyone
4 other than that specific Defense Team to have possession of
5 Confidential Information, including defendant, while outside the
6 presence of the Defense Team.

7 r. Each defendant's AEO Defense Team shall not permit
8 anyone other than members of that specific AEO Defense Team to see
9 and review AEO Information at any time. At no time, under no
10 circumstance, shall any AEO Information be shown to any defendant,
11 or left in the possession, custody, or control of any defendant,
12 regardless of that defendant's custody status. The AEO Defense Team
13 shall not show, orally disclose, or share in any manner, with any
14 defendant or any other individual or witness who is not a member of
15 the AEO Defense Team any AEO Information.

16 s. Notwithstanding the paragraph(s) above, each
17 defendant may see and review CI Materials only in the presence of
18 his specific defense counsel and said defense counsel shall ensure
19 that that defendant is never left alone with any CI Materials. At
20 the conclusion of any meeting with a defendant at which he is
21 permitted to view CI Materials, that defendant must return any CI
22 Materials to his defense counsel, who shall take all such materials
23 with counsel. That defendant may not take any CI Materials out of
24 the room in which he is meeting with his defense counsel. At no
25 time, under no circumstance, will any Confidential Information be
26 left in the possession, custody, or control of any defendant,
27 regardless of that defendant's custody status.

1 t. Notwithstanding the paragraph(s) above, each AEO
2 Defense Team member may see and review AEO Materials only in the
3 presence of defense counsel who is a member of that specific AEO
4 Defense Team and said defense counsel shall ensure that that other
5 members of the AEO Defense Team are never left alone with any AEO
6 Materials. At the conclusion of any meeting with the AEO Defense
7 Team at which members of the AEO Defense Team are permitted to view
8 AEO Materials, those members of the AEO Defense Team must return any
9 AEO Materials to defense counsel, who shall take all such materials
10 with counsel. Those members of the AEO Defense Team may not take
11 any AEO Materials out of the room in which he/she/they are meeting
12 with defense counsel. At no time, under no circumstance, will any
13 AEO Information be left in the sole possession, custody, or control
14 of any member of the AEO Defense Team, aside from defense counsel.
15 Aside from defense counsel, members of the AEO Defense Team may not
16 copy, keep, maintain, or otherwise possess AEO Materials.

17 u. Each defendant may review PII Materials and Medical
18 Materials only in the presence of a member of his specific Defense
19 Team, who shall ensure that that defendant is never left alone with
20 any PII Materials or Medical Materials. At the conclusion of any
21 meeting with a defendant at which he is permitted to view PII
22 Materials or Medical Materials, that defendant must return any PII
23 Materials or Medical Materials to his Defense Team, and the member
24 of the Defense Team present shall take all such materials with him
25 or her. That defendant may not take any PII Materials or Medical
26 Materials out of the room in which he is meeting with the Defense
27 Team.

1 v. Each defendant may see and review Confidential
2 Information as permitted by this Protective Order, but no defendant
3 may copy, keep, maintain, or otherwise possess any Confidential
4 Information in this case at any time. Also, no defendant may write
5 down or memorialize any data or information contained in the
6 Confidential Information.

7 w. No defendant can see, review, copy, keep, maintain,
8 summarize, memorialize, or otherwise possess any AEO Information as
9 defendants will have access to redacted versions of that same
10 discovery consistent with this Protective Order.

11 x. Members of a Defense Team may review Confidential
12 Information with a witness or potential witness in this case,
13 including its respective defendant; however, defense counsel must be
14 present whenever any CI Materials are being shown to a witness or
15 potential witness. A member of said Defense Team must be present if
16 PII Materials or Medical Materials are being shown to a witness or
17 potential witness. Before being shown any portion of Confidential
18 Information, however, any defense witness or potential witness must
19 be informed of, and agree in writing to be bound by, the
20 requirements of the Protective Order. All such members of the
21 Defense Team, witnesses, and proposed witnesses shall sign a
22 signature page provided by the government consistent with Exhibit A
23 attached to the underlying stipulation. The Defense Team shall
24 maintain those signature pages and shall not be required to produce
25 them absent a court order. No member of said Defense Team shall
26 permit a defense witness or potential witness to retain Confidential
27 Information or any notes generated from Confidential Information.
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1 y. Members of any AEO Defense Team may not review AEO
2 Information with anyone, including, but not limited to any
3 witness(es), potential witness(es), and/or defendants in this case
4 and must instead use the corresponding redacted discovery in
5 accordance with this Protective Order. Before being shown any
6 portion of AEO Information, any additional proposed members of the
7 AEO Defense Team must be identified to the government, and be
8 informed of, and agree in writing to be bound by, the requirements
9 of the Protective Order by the applicable defense counsel. Such
10 identification shall include signing a signature page provided by
11 the government consistent with Exhibit A attached to the underlying
12 stipulation. Aside from defense counsel, no members of the AEO
13 Defense Team shall be permitted to retain AEO Information or any
14 notes generated from AEO Information.

15 z. Each Defense Team shall maintain Confidential
16 Information safely and securely, and shall exercise reasonable care
17 in ensuring the confidentiality of those materials by (1) not
18 permitting anyone other than members of the Defense Team, defendant,
19 witnesses, and potential witnesses, as restricted above, to see
20 Confidential Information; (2) not divulging to anyone other than
21 members of the Defense Team, defendant, witnesses, and potential
22 witnesses, the contents of Confidential Information; and (3) not
23 permitting Confidential Information to be outside the Defense Team's
24 offices, homes, vehicles, or personal presence. CI Materials shall
25 not be left unattended in any vehicle.

26 aa. Each defense attorney shall maintain AEO Information
27 safely and securely, and shall exercise reasonable care in ensuring
28 the confidentiality of those materials by (1) not permitting anyone

1 other than members of their respective AEO Defense Team to see and
2 review AEO Information; (2) not divulging to anyone other than
3 members of their respective AEO Defense Team the contents of AEO
4 Information; and (3) not permitting AEO Information to be outside of
5 counsel's office(s) or personal presence. AEO Information shall not
6 be left unattended in any vehicle.

7 bb. To the extent that a defendant, his Defense Team,
8 witnesses, or potential witnesses create notes that contain, in
9 whole or in part, Confidential Information, or to the extent that
10 copies are made for authorized use by members of the Defense Team,
11 such notes, copies, or reproductions become Confidential Information
12 subject to the Protective Order and must be handled in accordance
13 with the terms of the Protective Order.

14 cc. To the extent that members of an AEO Defense Team
15 create notes that contain, in whole or in part, AEO Information, or
16 to the extent that copies are made for authorized use by members of
17 the AEO Defense Team, such notes, copies, or reproductions become
18 AEO Information subject to the Protective Order and must be handled
19 in accordance with the terms of the Protective Order.

20 dd. Each Defense Team shall use Confidential Information
21 only for the litigation of this matter and for no other purpose.
22 Litigation of this matter includes any appeal filed by defendant and
23 any motion filed by defendant pursuant to 28 U.S.C. § 2255. In the
24 event that a party needs to file Confidential Information with the
25 Court or divulge the contents of Confidential Information in court
26 filings, the filing should be made under seal. If the Court rejects
27 the request to file such information under seal, the party seeking
28 to file such information publicly shall provide advance written

1 notice to the other party to afford such party an opportunity to
2 object or otherwise respond to such intention. If the other party
3 does not object to the proposed filing, the party seeking to file
4 such information shall redact any CI Materials, PII Materials, or
5 Medical Materials and make all reasonable attempts to limit the
6 divulging of CI Materials, PII Materials, or Medical Materials.

7 ee. Each AEO Defense Team shall use AEO Information only
8 for the litigation of this matter, which includes any appeal filed
9 by defendants and any motion filed by defendants pursuant to 28
10 U.S.C. § 2255, and for no other purpose but shall not file any AEO
11 Information without first redacting such information or, in the
12 event that a party needs to file AEO Information with the Court or
13 divulge the contents of AEO Information in court filings, the filing
14 should be made under seal. If the Court rejects the request to file
15 such information under seal, the party seeking to file such
16 information publicly shall provide advance written notice to the
17 other party to afford such party an opportunity to object or
18 otherwise respond to such intention. If the other party does not
19 object to the proposed filing, the party seeking to file such
20 information shall redact any AEO Information and make all reasonable
21 attempts to limit the divulging of AEO Information.

22 ff. Any Confidential Information inadvertently produced
23 in the course of discovery prior to entry of the Protective Order
24 shall be subject to the terms of the Protective Order. If
25 Confidential Information was inadvertently produced prior to entry
26 of the Protective Order without being marked "CONFIDENTIAL
27 INFORMATION -- CONTENTS SUBJECT TO PROTECTIVE ORDER" or something
28 similar, the government shall reproduce the material with the

1 correct designation and notify defense counsel of the error. The
2 Defense Team shall take immediate steps to destroy the unmarked
3 material, including any copies.

4 gg. Any AEO Information inadvertently produced in the
5 course of discovery prior to entry of the Protective Order shall be
6 subject to the terms of the Protective Order. If AEO Information
7 was inadvertently produced prior to entry of the Protective Order
8 without being marked "ATTORNEY'S EYES ONLY -- CONTENTS SUBJECT TO
9 PROTECTIVE ORDER" or something similar, the government shall
10 reproduce the material with the correct designation and notify
11 defense counsel of the error. The AEO Defense Team shall take
12 immediate steps to destroy the unmarked material, including any
13 copies.

14 hh. If any Confidential Information contains both CI
15 Materials and another category of Confidential Information, the
16 information shall be handled in accordance with the CI Materials
17 provisions of the Protective Order.

18 ii. If any AEO Information contains both AEO Materials
19 and another category of Confidential Information, the information
20 shall be handled in accordance with the AEO Materials provisions of
21 the Protective Order.

22 jj. No AEO Defense Team member shall disclose the fact
23 that an individual is a CI, CW, and/or cooperating defendant to any
24 individual who is not also an AEO Defense Team member.

25 kk. Confidential Information shall not be used by any
26 defendant or Defense Team, in any way, in any other matter, absent
27 an order by this Court. All materials designated subject to the
28 Protective Order maintained in any Defense Team's files shall remain

1 subject to the Protective Order unless and until such order is
2 modified by this Court. Within 30 days of the conclusion of
3 appellate and post-conviction proceedings, defense counsel shall
4 return CI Materials to the government or certify that such materials
5 have been destroyed. Within 30 days of the conclusion of appellate
6 and post-conviction proceedings, defense counsel shall return all
7 PII Materials or Medical Materials, certify that such materials have
8 been destroyed, or certify that such materials are being kept
9 pursuant to the California Business and Professions Code and the
10 California Rules of Professional Conduct.

11 11. AEO Information shall not be used by the AEO Defense
12 Team, in any way, in any other matter, absent an order by this
13 Court. All AEO Materials designated subject to the Protective Order
14 maintained in defense counsel's files shall remain subject to the
15 Protective Order unless and until such order is modified by this
16 Court. Within 30 days of the conclusion of appellate and post-
17 conviction proceedings, defense counsel shall return AEO Materials
18 to the government or certify that such materials have been
19 destroyed.

20 mm. In the event that there is a substitution of counsel
21 prior to when such documents must be returned, new defense counsel
22 must be informed of, and agree in writing to be bound by, the
23 requirements of the Protective Order before the undersigned defense
24 counsel transfers any Confidential Information to the new defense
25 counsel. New defense counsel's written agreement to be bound by the
26 terms of the Protective Order must be returned to the Assistant U.S.
27 Attorney(s) assigned to the case. New defense counsel then will
28 become the Defense Team and the AEO Defense Team's custodian of

1 materials designated subject to the Protective Order and shall then
2 become responsible, upon the conclusion of appellate and post-
3 conviction proceedings, for: (1) returning to the government,
4 certifying the destruction of, or retaining pursuant to the
5 California Business and Professions Code and the California Rules of
6 Professional Conduct all PII Materials or Medical Materials; and
7 (2) returning to the government or certifying the destruction of all
8 CI Materials and AEO Materials.

9 nn. Defense counsel shall advise their respective
10 defendant and all members of their Defense Team and AEO Defense Team
11 of their obligations under the Protective Order and ensure their
12 agreement to follow the Protective Order, prior to providing
13 defendant, members of the Defense Team, and/or members of the AEO
14 Defense Team with access to any materials subject to the Protective
15 Order.

16 IT IS SO ORDERED.

17 September 8, 2025

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DATE

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HONORABLE JOSEPHINE L. STATON
UNITED STATES DISTRICT JUDGE